

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Wireline Competition Bureau Seeks	)	WC Docket No. 13-184
Comment on Category Two Budgets	)	

**COMMENTS OF THE OHIO E-RATE INTERNET TECHNOLOGY CENTERS**

The Ohio E-Rate Internet Technology Centers (“ITCs”) hereby submit these comments in response to the Public Notice (“Notice”) released by the Federal Communications Commission (“FCC” or “Commission”) in the above-captioned proceeding.<sup>1</sup> The ITCs are semi-public entities that provide telephone, Internet, and high-speed data to public and non-public K-12 schools throughout Ohio.<sup>2</sup> The ITCs have been providing telephone, Internet and high-speed data services to Ohio schools since prior to the start of the E-Rate program and continue to provide the services under the E-Rate program.

**I. INTRODUCTION AND SUMMARY**

In the *E-rate Modernizations Orders*, the Commission adopted five-year, pre-discount budgets for schools and libraries for Category Two Funding.<sup>3</sup> As part of the *E-rate Modernization Order*, the Commission also determined that managed internal broadband

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<sup>1</sup> Wireline Competition Bureau Seeks Focused Comment on Category Two Budgets, WC Docket No. 13-184, Public Notice, DA 17-921 (rel. September 22, 2017) (“Notice”).

<sup>2</sup> The Ohio ITCs submitting comments are Regional Council of Governments, established under Ohio Revised Code § 167 for the purpose of participation in the Ohio Education Computer Network (see List of Commenters at Exhibit 1).

<sup>3</sup> *Modernizing the E-rate Program for Schools and Libraries*, WC Docket No. 13-184, Order, 29 FCC Rcd 8870, 8902, para. 86 (2014) (“*E-rate Modernization Order*”); *Modernizing the E-rate Program for Schools and Libraries*, WC Docket Nos. 13-184 and 10-90, Second Report and Order and Order on Reconsideration, 29 FCC Rcd 15538, 15571, para 82 (2014) (“*Second E-Rate Modernization Order*”); 47 CFR § 54.502(b).

services to cover the operation, management and monitoring of a LAN or WLAN would be eligible for internal connections support.<sup>4</sup> Since that time the Ohio school districts served by the ITCs have largely utilized their Category Two budgets for the purchase of managed internal broadband services necessary to bring connectivity to their schools and allow for the use of wireless devices in classrooms. The Category Two budgets have been essential to provide for the managed internal broadband services and to support bringing Internet access into the classroom. While the Category Two budgets are still partially available for some school districts, others have completely utilized their Category Two budgets and now face the reality that they will not be able to expand or upgrade their wireless equipment until the end of the five year budget cycle.

## **II. EXISTING USE OF CATEGORY TWO FUNDING**

The following summarizes the use of Category Two funding by Ohio schools supported by the ITCs:

- Purchase/Replacement of Network Switches
- Purchase/Replacement of Wireless Access Points
- Purchase/Replacement of Cabling, Connectors, and Related Components Used for Internal Broadband Connections
- Upgrading and Support of Wireless Networks
- Installation of Wireless Networks for use by teachers and students throughout school buildings
  - Supports use of devices in classrooms, rather than only in computer labs.
  - Supports use of newer projectors and interactive panels that require wireless connectivity
  - Support for district 1:1 initiatives, i.e., one device for every child

## **III. PLANNED USE OF CATEGORY TWO FUNDING**

The following summarizes the planned uses of category funding over the remaining budget term for expansion and upgrading of eligible Category Two equipment and services:

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<sup>4</sup> *E-Rate Modernization Order* at §123.

- Upgrading of network switches
- Purchase of new networking closet switches
- Caching
- Uninterruptible Power Supply (UPS)/Battery Backup
- Replacement of network equipment
- Purchase of new wireless access points to expand service to buildings
- Replacement of cabling, connectors, and related components used for internal broadband connections

#### IV. CONCLUSION

The ITCs would like to stress to the Commission the continued need for Category Two funding to support bringing Internet access into the classroom. The ITCs appreciate the Commission's evaluation of the current budgeting process and look forward to continued support from the Schools and Libraries program for their Districts.

Respectfully submitted,

OHIO INTERNET TECHNOLOGY  
CENTERS

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## **Exhibit 1**

### **List of Internet Technology Centers**

Area Cooperative Computerized Educ Svc System

Hamilton Clermont Cooperative

Licking Area Computer Association

Lake Geauga Computer Association

Meta Solutions

Miami Valley Educational Computer Association

North Central Ohio Computer Cooperative

NorthEast Ohio Management Information Network

Northeast Ohio Network for Educational Technology

Northwest Ohio Area Computer Services Cooperative

Northern Ohio Educational Computer Association

Northwest Ohio Computer Association

Ohio Mid-Eastern Regional Education Service Agency

Tri-County Computer Services Association

Western Ohio Computer Organization

Southwest Ohio Computer Association

North Coast Council

South Central Ohio Computer Association

Stark -Portage Area Computer Consortium